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December 18, 2019

The Hon. Frederic Block  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201  
Via ECF

**Re: United States v. Mark Kocaj,  
Indictments 19-CR-575 (FB) & 19-Cr-577 (FB)**

Dear Judge Block:

The defendant is at liberty upon terms of bail that include home detention and GPS monitoring. Accordingly, he requests a modification of the terms of release to permit travel to the Bronx on December 20, 2019 and to the Bronx and White Plains on December 21, 2019 as specified herein. I have consulted with A.U.S.A. Keith Edelman who does not object.

The defendant requests permission to leave his home on December 20, 2019 at 6:00 pm to travel to a family dinner in the Bronx, as detailed to Pre-trial services, and return to his home by 11:00 pm that same night. The defendant also requests permission to leave his home on December 21, 2019 at 12:00 pm to travel to the Bronx and White Plains, New York, in order to shop for the holidays, as detailed to Pre-Trial services, and return home by 5:00 pm that same day.

I have advised US Pre-trial Services Officer Leo Barrios (SDNY) and Officer Carter (EDNY) via email and am unaware of any objections.

Wherefore, it is respectfully requested that the defendant's bail conditions be modified to permit travel to the Bronx on December 20, 2019 and to the Bronx and White Plains December 21, 2019.

Respectfully,

/s  
Christopher Booth

Cc: AUSA Keith Edelman: [Keith.Edelman@usdoj.gov](mailto:Keith.Edelman@usdoj.gov)  
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